

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

ASHLEY H. THOMPSON, mother,
JORDAN THOMPSON, minor child,
and RONALD C. THOMPSON,
husband,

Plaintiffs,

v.

RUBEN GARZA,

Defendant.

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* CIVIL ACTION NO. 2:06-cv-420-WHA

EXHIBIT LIST OF DEFENDANT

COMES NOW the Defendant, Ruben G. Garza, by and through counsel, and submits the following documents or things may be introduced as evidence at the trial of this case:

1. Photographs of accident scene taken by Ruben Garza.
2. Photographs of accident scene taken by defense counsel.
4. Documents obtained from the Social Security Administration on Ashley Thompson.
5. Excerpts of bankruptcy proceeding file of Ronald C. Thompson and Ashley Ruth Thompson (04-31637).
6. CV of Leigh Clemmons, M.Ed., CRC, Licensed Professional Counselor.
7. April 30, 2007, report of Leigh Clemmons, with supporting documentation.
8. Plaintiffs' Responses to Defendant's Interrogatories and Requests for Production.
9. Prattville Baptist Hospital records on Ashley Thompson from April 20, 2005.
10. Prattville Baptist Hospital records from September 15, 2003.

11. Prattville Baptist Hospital records from February 17, 2003.
12. Prattville Baptist Hospital records from April 2, 2002.
13. Prattville Baptist Hospital records on Ashley Thompson from December 12, 2001.
14. Autauga Medical Center records from February 23, 1996.
15. April 29, 2005, medical records on Ashley Thompson from Prattville Medical Clinic, P.C.
16. November 6, 2003, medical records on Ashley Thompson from Prattville Medical Clinic, P.C.
17. Admission form of Ashley Thompson to Prattville Medical Clinic, P.C.
18. August 16, 1999, medical history form executed by Ashley Thompson to Southern Orthopedic Surgeons, LLC.
19. Patient information form to Southern Orthopedic Surgeons, LLC, dated August 16, 1999.
20. Records obtained from Blue Cross and Blue Shield of Alabama regarding subrogation claim of \$5,654.62.
21. Any non-objectionable exhibit listed by the Plaintiff.
22. The Defendant reserves the right to amend this list pending the completion of investigation and discovery in this case.
23. The Defendant reserves the right to use additional documents and things for impeachment purposes.
24. The Defendant reserves the right to use any of the listed documents or other items for demonstrative purposes.

Respectfully submitted this the 10th day of May, 2007.

/s/ S. Anthony Higgins
S. ANTHONY HIGGINS
Attorney for Defendant

OF COUNSEL:
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CERTIFICATE OF SERVICE

I hereby certified that on the 10th day of May, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Jay Lewis, Esq.
K. Anderson Nelms, Esq.
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/s/S. Anthony Higgins
Of Counsel